



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

RECEIVED

MAY 06 1980

Department of Natural Resources  
Office of Environmental Affairs

Mr. C. J. Nettles  
Chief, Operations Division  
Department of the Army  
New Orleans District, Corps of Engineers  
P.O. Box 60267  
New Orleans, Louisiana 70160

RE: PUBLIC NOTICE LMNOD-SP (Mississippi River)1108  
Johns-Manville Corporation

Dear Mr. Nettles:

Thank you for sending us a copy of your public notice, dated April 2, 1980, announcing the proposal by Johns-Manville Corporation to degrade the water-side bank and install and maintain a fill and riprap on its inactive asbestos waste disposal site which is located on the Mississippi River at Marrero, Louisiana. As a hazardous air pollutant, the asbestos that is contained within this disposal site makes it an inactive waste disposal site which is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated for asbestos in 40 CFR Part 61, Subpart B.

We have reviewed the proposed project insofar as it is a major effort by Johns-Mannville to bring its disposal site into compliance with the NESHAP standard for asbestos that applies to inactive asbestos waste disposal sites, 40 CFR, 61.22(L), and find it acceptable.

However, we are concerned about the potential for hazardous asbestos particles to be released into the atmosphere and become airborne when the bank of the disposal site is degraded. The asbestos NESHAP standard, 40 CFR, 61.22(L)(1), as promulgated under the authority of Section 112 of the Clean Air Act, 42 USC 7412, specifically prohibits any visible emissions to the outside air from an inactive asbestos waste disposal site such as the subject disposal site of Johns-Mannville.

Therefore, we recommend that all necessary measures be employed during all phases of the proposed project and especially during the degrading operation to prevent visible emissions to the outside air from the disposal site and avoid emissions of asbestos particles from becoming airborne. In this regard we specifically recommend the following:

- (1) All exposed waste material of the disposal site, subject to traffic and removal by degrading, should be adequately wetted during the project.

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- (2) All waste material of the disposal site that has been removed or displaced during degrading should be adequately wetted to ensure that the material remains wet during all remaining stages of the project and related handling operations.

Since a potential hazard to the work environment of this proposed project is apparent, I am sending a copy of this letter and your public notice to Mr. William Demery of the Occupational Safety and Health Administration Regional office for his interest and concern in the matter.

Sincerely,

*Jim Collins*

for Diana Dutton, Director  
Enforcement Division (6AE)

cc: Mr. William Demery w/enclosure  
U.S. DOL-OSHA  
555 Griffin Square Bldg.  
Dallas, Texas 75202

Mr. B. Jim Porter w/enclosure  
Assistant Secretary  
Department Of Natural Resources  
P.O. Box 44396  
Baton Rouge, Louisiana 70804

Mr. J. E. Smith w/enclosure  
Plant Manager  
Johns-Manville  
Sales Corporation  
P.O. Box 128  
Marrero, Louisiana 70073

Johns-Manville Corporation w/out enclosure  
c/o Lanier & Associates Consulting Engineers, Inc.  
4101 Magazine Street  
New Orleans, Louisiana 70115

United States  
Environmental Protection  
Agency

Region 6  
1201 Elm Street  
Dallas TX 75270

Arkansas, Louisiana,  
Oklahoma, Texas,  
New Mexico



## ENVIRONMENTAL SERVICES

DIVISION OF AIR CONTROL  
AND OCCUPATIONAL HEALTH

JUN 8 1979

JUN 11 1979  
RECEIVED

AIR CONTROL SECTION

Mr. Milton Veazie  
6270 Field Street  
Marrero, Louisiana 70072

JUN 13 1979

JUN 11 1979

AM 7 8 9 10 11 12 1 2 3 4 5 6 PM

Dear Mr. Veazie:

TECHNICAL ASSISTANCE  
FIELD INVESTIGATION

Thank you for your letter of May 16, 1979, concerning the Johns Manville's Plant located in Jefferson Parish, Louisiana. I appreciate your concern about this asbestos problem and want to assure you that we are presently reviewing this situation and will take prompt enforcement action should our review indicate such action is necessary. The Johns Manville disposal site is subject to the National Emission Standards for Hazardous Pollutants which requires that asbestos disposal sites (both active and inactive) follow specific procedures regarding asbestos. Our review will determine if there is a violation of these regulations and the basis for an enforcement action.

I will keep you advised on the progress of our review and any action EPA takes regarding this asbestos disposal site. If you have any questions, please feel free to contact me at (214) 767-2755.

Sincerely yours,

John Hepola  
Chief, Engineering Section  
Air Enforcement Branch

cc: James F. Coerver ✓  
Technical Secretary  
325 Loyola Avenue  
P.O. Box 60630  
New Orleans, Louisiana 70160

Voe Bodinger  
Tanner  
Brasher  
Gatzke  
Landry  
McKinley  
Wesconick  
Medal

OT 6/13  
Voe  
Dec 5  
Johns Manville

Gus



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

NOV 03 1982

Mr. E. B. Carpenter  
Plant Manager  
Johns-Manville Incorporated  
P. O. Box 128  
Marrero, Louisiana 70073

MB

RE: Engineering-Science Inspection of June 26, 1982,  
40 CFR 61, Subpart A and Bc/s  
RECEIVED  
NOV 03 1982  
AIR QUALITY DIVISION  
OEA/DNR

Dear Mr. Carpenter:

We have evaluated the results of the inspection conducted on June 26, 1982, for your Roofing Material Division facility at Marrero, Louisiana, and the subsequent visit to the plant by Mr. Glenn Draper of Engineering-Science on September 10, 1982.

Based on our evaluation, compliance with the no visible emissions to the outside air requirement of 61.22(c)(7) of the National Emission Standard for Asbestos cannot be determined since the manufacturing process was down for approximately one month prior to the inspection and was not in operation at the time of the inspection.

Additionally, we would like to point out that 40 CFR 61.22(j) places the responsibility of proper asbestos waste disposal in accordance with the provisions of 40 CFR 61.25 on the owner or operator of manufacturing facility. Based on information provided in the addendum to the inspection report, Johns-Manville is storing the waste in the Marrero Plants' Warehouse. Approximately 20 to 30 plastic bags containing asbestos waste are stored in a small area in the warehouse. Please advise us, within 30 days of receipt of this letter, the name and address or location of the waste disposal site where the friable asbestos waste will be deposited in accordance with 40 CFR 61.25.

If you have any questions regarding this letter, please call Ms. Tanya Murray at (214) 767-9871.

Sincerely yours,

William H. Taylor, Jr.

William H. Taylor, Jr., Chief  
Technical Section  
Air Branchcc: Mr. Gus Von Bodungen, Program Administrator ✓  
Louisiana Department of Natural Resources